

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

EDWARD SILFIES
AKA: ED SILFIES
KELLY ELLIOTT
AKA: KELLY ANN ELLIOTT-SILFIES,
KELLY SILFIES

Debtors

CHARLES J. DEHART, III
CHAPTER 13 TRUSTEE

CHAPTER 13

Movant

CASE No. 5-16-04475-RNO

vs.

EDWARD SILFIES
AKA: ED SILFIES
KELLY ELLIOTT
AKA: KELLY ANN ELLIOTT-SILFIES,
KELLY SILFIES

Respondents

REPLY TO TRUSTEE'S MOTION TO DISMISS CASE

NOW COME the above-captioned Debtors, through their attorney, Raymond W. Ferrario, and reply to the Trustee's Motion to Dismiss case as follows:

1. The Debtors are filing a Motion to modify their confirmed Plan to extend the length of the payment plan in order to cover all arrearages.
2. The Debtors have been adversely affected by COVID-19 and are eligible to extend their confirmed Chapter 13 Plan by twelve (12) additional months.

WHEREFORE, Debtors, Edward Silfies and Kelly Ann Elliott, request the Court deny Trustee's Motion to Dismiss the case.

Respectfully submitted,

RAYMOND W. FERRARIO, P.C.

by s/Raymond W. Ferrario
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Supreme Court I.D. No. 35096